

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. _____
:
: DATE FILED: _____
:
v. : VIOLATION: 26 U.S.C. § 7206(1)
: (Filing false
: tax returns - 3
: Counts)
FRANK D. HENDRICKSON, III :

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times relevant to this Indictment:

INDIVIDUALS AND ENTITIES

1. Defendant FRANK D. HENDRICKSON, III was the sole proprietor of VALLEY FORGE RARE COINS in King of Prussia, Pennsylvania.

2. Bryn Mawr Trust Company was a financial institution where defendant FRANK D. HENDRICKSON, III maintained a business bank account in the name of VALLEY FORGE RARE COINS.

3. First Union Bank (now Wachovia) was a financial institution where defendant FRANK D. HENDRICKSON,

III maintained a business bank account in the name of VALLEY FORGE RARE COINS.

4. The Internal Revenue Service was an agency of the United States Department of Treasury.

5. In 1998, 1999 and 2000, defendant FRANK D. HENDRICKSON, III deposited his gross receipts in VALLEY FORGE RARE COINS business bank accounts at Bryn Mawr Trust and First Union Bank. The deposits into these accounts totaled approximately \$1,807,160 in 1998, \$1,787,343 and \$2,115,184 in 2000.

6. In 1998, 1999 and 2000, respectively, defendant FRANK D HENDRICKSON, III reported gross receipts on his federal individual income tax return of \$1,537,068.21, \$1,357,662.81 and \$1,252,250.68.

7. From 1998 through 2000, defendant FRANK D. HENDRICKSON, III loaned approximately \$528,000 to an individual known to the grand jury as "R.R." Defendant FRANK D. HENDRICKSON was paid \$10,000 in interest for these loans, which he failed to report on his federal individual income tax returns.

8. From 1998 through 2000, in an effort to conceal his actual gross receipts and spending, defendant FRANK D. HENDERSON, III withdrew \$9,900 on approximately 400 occasions knowing that if he withdrew \$10,000 or more at a time, Bryn Mawr Trust and First Union Bank would report such transactions to the Internal Revenue Service.

9. On or about April 15, 1999, in the Eastern District of Pennsylvania, defendant

FRANK D. HENDRICKSON, III

willfully made and subscribed to a United States Individual Income Tax Return, IRS Form 1040 with an attached Schedule C, for the calender year 1998, which was verified by a written declaration that it was made under the penalties of perjury and filed with the director, Internal Revenue Service Center, Mid-Atlantic Region, at Philadelphia, Pennsylvania, which defendant FRANK D. HENDRICKSON, III did not believe to be true and correct as to every material matter, in that the return reported gross receipts of \$1,537,068.21 on line 1 of the Schedule C, when in fact, as

defendant FRANK D. HENDRICKSON, III well knew, he had gross receipts in excess of the amount that he reported.

In violation of Title 26, United States Code,
Section 7206(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8 of Count One are realleged here.

2. On or about January 21, 2000, in the Eastern District of Pennsylvania, defendant

FRANK D. HENDRICKSON, III

willfully made and subscribed to a United States Individual Income Tax Return, IRS Form 1040 with an attached Schedule C, for the calender year 1999, which was verified by a written declaration that it was made under the penalties of perjury and filed with the director, Internal Revenue Service Center, Mid-Atlantic Region, at Philadelphia, Pennsylvania, which defendant FRANK D. HENDRICKSON, III did not believe to be true and correct as to every material matter in that the return reported gross receipts of \$1,357,662.81 on line 1 of the Schedule C, when in fact, as defendant FRANK D. HENDRICKSON, III well knew, he had gross receipts in excess of the amount that he reported.

In violation of Title 26, United States Code, Section 7206(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 8 of Count One are realleged here.

2. On or about March 10, 2001, in the Eastern District of Pennsylvania, defendant

FRANK D. HENDRICKSON, III

willfully made and subscribed to a United States Individual Income Tax Return, IRS Form 1040 with an attached Schedule C, for the calender year 2000, which was verified by a written declaration that it was made under the penalties of perjury and filed with the director, Internal Revenue Service Center, Mid-Atlantic Region, at Philadelphia, Pennsylvania, which defendant FRANK D. HENDRICKSON, III did not believe to be true and correct as to every material matter in that the return reported gross receipts of \$1,252,250.68 on line 1 of the Schedule C, when in fact, as

defendant FRANK D. HENDRICKSON, III well knew, he had gross receipts in excess of the amount that he reported.

In violation of Title 26, United States Code,
Section 7206(1).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney